



Rob McKenna

ATTORNEY GENERAL OF WASHINGTON

1125 Washington Street SE • PO Box 40100 • Olympia WA 98504-0100

06-280
King Broadcasting
Company

October 18, 2005

RECEIVED

OCT 19 2005

Public Disclosure Commission

Vicki Rippie
Executive Director
Public Disclosure Commission
P. O. Box 40908
Olympia, WA 98504-0908

RE: Richard Shepard 45 Day Letter – Belo Corporation, King Broadcasting Company, d/b/a King TV

Dear Ms. Rippie:

The Attorney General's Office has received a complaint from Mr. Richard Shepard against Belo Corporation and King Broadcasting Company, d/b/a King TV. The complaint alleges violations of the Public Disclosure Law, Ch. 42.17 RCW, and was filed pursuant to RCW 42.17.400(4). As you know, RCW 42.17.400(4) requires action on the complaint within 45 days of its receipt. In this case, the complaint was received on October 13, 2005. I have provided a copy for your records.

As is customary with these types of complaints, we are referring the complaint to your agency for investigation. We will await the results of your investigation before proceeding further. In the event the Commission determines that it is appropriate to schedule an administrative hearing, please advise. Otherwise, we would request the Commission's recommendation with the report of investigation. Please note that Mr. Shepard has filed a case on behalf of Ruth Bennett against these same companies and has indicated that in the event action is not brought within 45 days, he will pursue remedies under RCW 42.17.400.

I have been assigned the file in our office. I am available to answer any legal questions you may have during the course of your investigation.

If you have any questions, please do not hesitate to call me at (360) 753-0543.

Sincerely,

LINDA A. DALTON
Sr. Assistant Attorney General

LAD:eg

cc: Richard Shepard
Rob McKenna, Attorney General
Jeff Goltz, Deputy Attorney General



Shepard Law Office, Inc.

Richard Shepard, J. D., Attorney at Law

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OCT 11, 2005

Rob McKenna, Washington Attorney General
1125 Washington St. SE
PO Box 40100
Olympia, WA. 98504-0100

Norm Maleng, King Co. Prosecuting Attorney
W554 King County Courthouse
516 Third Avenue
Seattle, WA 98104

Re: Bennett v. KING-TV – NOTICE PER R.C.W. § 42.17.400(4)

To Whom It May Concern:

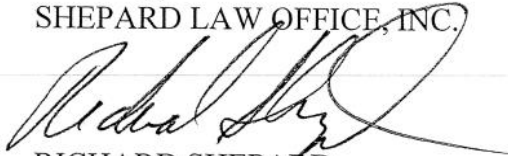
Please find enclosed a copy of an amended complaint recently filed in King County Superior Court involving former gubernatorial candidate Ruth Bennett and KING-TV and regarding the 2004 candidate debates aired by the television station. As the amended complaint is currently postured, Ms. Bennett has claimed that KING-TV discriminated against her on the basis of sexual orientation or political ideology under Seattle Municipal Code 14.04.

However, the facts appear to support another claim that the debates and/or the polls taken amounted to illegal in-kind contributions to the candidates who appeared in the debates, in violation of R.C.W. § 42.17.640(1).

This letter is your notice as required by R.C.W. § 42.17.400(4) that Ms. Bennett intends to pursue this matter judicially, by further amendment to the complaint, if no state or local enforcement agency acts appropriately within the time required by the statute.

Please contact me if you have any questions or concerns, if you need additional information, or if your agency makes a formal determination regarding its involvement in this matter.

Sincerely,
SHEPARD LAW OFFICE, INC.


RICHARD SHEPARD

RS:mas
Enclosures

Cc: client

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ATTORNEY GENERAL
OF WASHINGTON